

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE CURO GROUP HOLDINGS CORP.
DERIVATIVE LITIGATION

Lead Case No. 1:20-cv-00851-LPS

NOTICE OF VOLUNTARY DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiffs Melvyn Klein, John Watt, and Patrick Ayers (“Plaintiffs”), by and through Plaintiffs’ undersigned counsel, hereby give notice that the above-captioned action is voluntarily dismissed, without prejudice, against the Defendants.

Voluntary dismissal is appropriate under Fed. R. Civ. P. 41(a)(1) given that Defendants have not answered the Complaint nor filed a motion for summary judgment.

Notice of this voluntary dismissal is not required under Fed. R. Civ. P. 23.1(c) because neither Plaintiffs nor Plaintiffs’ counsel have received or will receive any compensation for this dismissal whatsoever except that Counsel for the parties have conferred and agreed that all parties shall bear their own costs of this litigation.

Dated: July 9, 2021

RIGRODSKY LAW, P.A.

By: /s/ Gina M. Serra

Seth D. Rigrotsky (#3147)
Gina M. Serra (#5387)
Herbert W. Mondros (#3308)
300 Delaware Avenue, Suite 210
Wilmington, DE 19801
Telephone: (302) 295-5310
Facsimile: (302) 654-7530
Email: sdr@rl-legal.com
Email: gms@rl-legal.com
Email: hwm@rl-legal.com

OF COUNSEL:

RM LAW, P.C.

Richard A. Maniskas
1055 Westlakes Drive, Suite 300
Berwyn, PA 19312
Telephone: (484) 324-6800
Facsimile: (484) 631-1305
Email: rm@maniskas.com

*Counsel for Plaintiffs John Watt and
Patrick Ayers*

SHUMAN, GLENN & STECKER

Kip B. Shuman
100 Pine Street, Ste. 1250
San Francisco, CA 94111
(303) 861-3003
kip@shumanlawfirm.com

Rusty E. Glenn
600 17th Street, Suite 2800
South Denver, CO 80202
(303) 861-3003
rusty@shumanlawfirm.com

*Counsel for Plaintiffs John Watt and
Patrick Ayers*

O'KELLY & ERNST, LLC

By: /s/ Ryan M. Ernst

Ryan M. Ernst (No. 4788)
824 N. Market Street, Ste. 1001A
Wilmington, DE 19801
(302) 778-4000
rernst@oelegal.com

GAINEY McKENNA & EGGLESTON

Thomas J. McKenna
501 Fifth Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 983-1300
Facsimile: (212) 983-0383
Email: gegleston@gme-law.com

Counsel for Plaintiff Melvyn Klein